



# ARMSTRONG®

03/24/2017

To: Federal Communications Commission

From: Armstrong Telephone Company – Northern Division  
Armstrong Telephone Company – West Virginia  
Armstrong Telephone Company – New York

Re: Forbearance Notification  
WC Docket No. 11-42 – Lifeline and Link Up Reform and Modernization

Armstrong Telephone Company – Northern Division (SAC 200267), Armstrong Telephone Company – West Virginia (SAC 200256), and Armstrong Telephone Company – New York (SAC 150071) (collectively, “the Armstrong Companies”) hereby notify the FCC that they are availing themselves of forbearance relief granted by the *Lifeline Modernization Order*<sup>1</sup> from the obligation to offer Lifeline-supported broadband Internet access service. The Armstrong Companies are owned by Armstrong Holdings, Inc.

The Armstrong Companies are eligible telecommunications carriers (ETC) that receive Alternative Connect America Cost Model (A-CAM) support in West Virginia and New York. The Companies elect forbearance relief for those census blocks in its study areas that are not funded under A-CAM. The Companies do not receive high-cost support for those unfunded census blocks and are not subject to high-cost public interest broadband obligations in them. What follows is the information the Wireline Competition Bureau has requested in these notifications.<sup>2</sup>

1. *Carrier Names:* Armstrong Telephone Company – Northern Division, Armstrong Telephone Company – West Virginia, and Armstrong Telephone Company – New York

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<sup>1</sup> *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016) (*Lifeline Modernization Order*). In particular, the *Lifeline Modernization Order* forbore from requiring high-cost support recipients to offer Lifeline-supported broadband in areas where they are not receiving high-cost support or are not subject to high-cost public interest broadband obligations. *Id.*, 31 FCC Rcd 4074-75, paras. 309, 311, 312.

<sup>2</sup> *Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order*, WC Docket No. 11-42, Public Notice, 31 FCC Rcd 12672 (2016).

## 2. *ETC Designation Information*

- a. *ETC Designation Orders*: Public Service Commission of West Virginia; Armstrong Telephone Company – Northern Division, Armstrong Telephone Company – West Virginia, Hardy Telecommunications, Inc., War Telephone Company, Spruce Knob – Seneca Rocks Telephone, Inc. and West Side Telephone Company; Petition for designation of Independent Group member companies for designation as Eligible Telecommunications Carriers under the Telecommunications Act of 1996 *et al.*; Case No. 97-1174-T-PC *et al.*; Commission Order; December 19, 1997.

State of New York Public Service Commission; Proceeding on Motion of the Commission to Examine Issues Related to the Continuing Provision of Universal Service and to Develop a Regulatory Framework for the Transition to Competition in the Local Exchange Market; Proceeding on Motion of the Commission as to the Impact of the Modification of Final Judgment and the Federal Communications Commission's Docket 78-72 on Provision of Toll Service in New York State; Cases 94-C-0095 and 28425; Order Designating Eligible Telecommunications Carriers and Service Areas and Granting Waivers; December 1, 1997.

- b. *Designating Authorities*: Public Service Commission of West Virginia; State of New York Public Service Commission
  - c. *Type of Designation*: High-cost support recipient (*i.e.*, not Lifeline-only)
  - d. *Dates of ETC Designation*: December 19, 1997 for Armstrong Telephone Company – Northern Division and Armstrong Telephone Company – West Virginia; December 1, 1997 for Armstrong Telephone Company – New York
3. *Areas Where ETC Seeks Forbearance*: The Excel file that accompanies this notification contains lists of the census blocks, in numerical order by FIPS code, where the Armstrong Companies are availing themselves of forbearance relief. The listed census blocks are all those within each of the Companies' ETC-designated service area that are not funded under A-CAM.
  4. *Date and Reason for Change*: The Armstrong Companies received their first A-CAM support payments on February 28, 2017. Therefore, as of that date, the Companies no longer receive high-cost support for census blocks within their designated service areas that are not funded under the model and are not subject to broadband public interest obligations in those blocks.

5. *Information on Areas Where Carrier Elects to Offer Broadband:* Notwithstanding the forbearance relief the Armstrong Companies are claiming for its census blocks that do not receive A-CAM support, the Companies still intend to offer Lifeline-supported broadband in those blocks to the extent qualifying service is available.

Please feel free to contact me at 724-283-0925 or [dames@agoc.com](mailto:dames@agoc.com) if you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "David Ames". The signature is fluid and extends to the right with a long, sweeping tail.

David Ames  
Financial Analyst